

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

*Proposed Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND UNITED STATES TRUSTEE
EXTENDING TIME TO RESPOND TO
MOTION TO APPROVE SHORT-TERM
INCENTIVE PLAN**

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Office of the United
4 States Trustee (the “**U.S. Trustee**”) on the other. The Debtors and the U.S. Trustee are referred
5 to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a
6 “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On March 6, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
9 *§§ 105(a), 363, and 503(c) for Entry of an Order Approving (I) Short-Term Incentive Plan and*
10 *(II) Granting Related Relief* [Dkt No. 782] (the “**STIP Motion**”), which is set for a hearing
11 before the Court at 9:30 a.m. on April 9, 2019. Any response or opposition to the STIP Motion
12 is due by 4:00 p.m. (Pacific Time) March 20, 2019.

13 B. Counsel for the U.S. Trustee has requested, and proposed counsel for the Debtors
14 has agreed, that the time for the U.S. Trustee to respond to the STIP Motion be further extended.

15 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
16 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
17 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
18 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
19 **THAT:**

20 1. The time for the U.S. Trustee to file and serve any response or opposition
21 to the STIP Motion is extended through 4:00 p.m. (Pacific Time) on March 28, 2019.

22 *[Signatures on next page]*
23
24
25
26
27
28

1 Dated: March 19, 2019

2 KELLER & BENVENUTTI LLP

3
4 /s/ Jane Kim

5 Jane Kim

6 *Proposed Attorneys for Debtors*
7 *and Debtors in Possession*

Dated: March 19, 2019

OFFICE OF THE UNITED STATES
TRUSTEE

8
9 /s/ Timothy S. Laffredi

10 Timothy S. Laffredi

11 Trial Attorney
12 *Attorney for Andrew R. Vara,*
13 *Acting United States Trustee for Region 3¹*

14
15
16
17
18
19
20
21
22
23
24
25
26
27 ¹ Andrew R. Vara, Acting United States Trustee for Region 3, is acting in this appointment for Tracy Hope Davis,
28 United States Trustee for Region 17, who is recused from the above-captioned cases.